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November 27, 2001

TO: Internal Files

FROM: Stephen J. Demczak, Sr. Reclamation Specialist/Engineering, Team Lead *SSD Jay SM*

RE: Elimination of Subsidence Monitoring, Canyon Fuel Company, LLC., Soldier Canyon Mine, C/007/018-01B

SUMMARY:

The permittee is requesting to withdraw the requirements of conducting any type of subsidence monitoring at the Soldier Creek Mine until the mining operation commences. The Soldier Canyon Mine has been in temporary cessation since October of 1998. The Mining and Reclamation Plan has given the permittee right to request the withdrawal of any subsidence monitoring point or points which shows no change for two consecutive years. See Page 5-20 in the MRP.

TECHNICAL MEMO

TECHNICAL ANALYSIS:

OPERATION PLAN

SUBSIDENCE CONTROL PLAN

Regulatory Reference: 30 CFR 784.20, 817.121, 817.122; R645-301-521, -301-525, -301-724.

Analysis:

Subsidence Control Plan

The Mining and Reclamation Plan for the Soldier Canyon Mine states, "The subsiding areas which show no change for two consecutive years will be considered stable and will be omitted from further annual surveys". This statement is on Page 5-20 in the MRP. The permittee has submitted information that shows survey points 113, 921, and 931 have met these requirements in the Mining and Reclamation Plan. Table 5.25.7 illustrates the drop in elevation for the years 1997 thru 2000. The changes in elevation for the three survey points are insignificant. The changes in elevation for the three points vary from -0.02 feet to -0.18 feet for the past two years. These changes are within the limits of survey accuracy. For all practical purposes, the elevation changes are zero. The permittee has demonstrated that no additional subsidence surveys are required until, or if, mining commences in these areas. There is a possibility that mining could take place in these areas in the future if the mine is re-opened. This would depend on viability of the future coal market.

Findings:

The permittee has met the minimum requirements of the R645 Coal Rules and the Mining and Reclamation Plan for the Soldier Creek Mine.

RECOMMENDATIONS:

The permittee has met the minimum requirements of the R645 Coal Rules and conditions within the Soldier Creek Mining and Reclamation Plan. This amendment is recommended for approval.